

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ABBY GROSSBERG,

*Plaintiff,*

v.

FOX CORPORATION, FOX NEWS NETWORK,  
LLC, JERRY ANDREWS, TUCKER CARLSON,  
DAVID CLARK, THOMAS FOX, RALPH  
GIORDANO, ALEXANDER MCCASKILL,  
JUSTIN WELLS, and LESLEY WEST,

*Defendants.*

Civil Action No. 1:23-cv-02368-JMF

**DEFENDANT FOX NEWS NETWORK, LLC'S  
NOTICE OF EMERGENCY MOTION AND EMERGENCY MOTION TO SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Emergency Motion to Seal and Declaration of Krissy Katzenstein, and exhibits thereto, Defendant Fox News Network, LLC ("Fox News"), by and through its undersigned counsel, will and hereby does move this Court, before the Honorable Jesse M. Furman, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY at such date and time as the Court shall designate, for an order, sealing certain attorney-client privileged and work product information in Plaintiff's Complaint (Dkt. 1).

PLEASE TAKE FURTHER NOTICE that, because Fox News' attorney-client privileged and work product information is currently on the public docket, Fox News respectfully requests that the Court hear this Motion on an expedited basis.

Dated: March 22, 2023

Respectfully submitted,

**BAKER & MCKENZIE LLP**

By: /s/Krissy A. Katzenstein \_\_\_\_\_

Paul C. Evans  
Krissy Katzenstein  
452 Fifth Avenue  
New York, New York 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1600  
[paul.evans@bakermckenzie.com](mailto:paul.evans@bakermckenzie.com)  
[krissy.katzenstein@bakermckenzie.com](mailto:krissy.katzenstein@bakermckenzie.com)

*Attorneys for Defendant Fox News Network, LLC*